

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

Katherine Painter;)
Plaintiff,)
)
) No: 6:17-CV-00034
v.)
)
)
Blue Ridge Regional Jail Authority; Corrections)
Officer Timothy Farrar, individually and as an)
Agent of the Blue Ridge Jail Authority; and)
Corrections Officer Pitts, individually and as an)
Agent of the Blue Ridge Jail Authority;)
)
Defendants.)

PLAINTIFF'S RESPONSE TO DEFENDANT TIMOTHY FARRAR'S RULE 60(b)(4)
MOTION TO SET ASIDE DEFAULT JUDGMENT

NOW COME(S) the Plaintiff, Katherine Painter, by and through her attorneys, THE WARREN FIRM PLLC and ROMANUCCI & BLANDIN, LLC, and files this Response to Defendant Timothy Farrar's Rule 60(b)(4) Motion to Set Aside Default Judgment.

Respectfully submitted,

By: /s Bhavani Raveendran
Bhavani Raveendran

Attorney for Plaintiff
T. Vaden Warren, Jr.
THE WARREN FIRM PLLC
516 Locust Ave.
Charlottesville, VA 22902
Tel: (434) 972-9090
Fax: (434) 972-9091
Email: vwarren@warren-law.com
VA Bar No.: 42004

Bhavani Raveendran
ROMANUCCI & BLANDIN
321 N. Clark St.; Ste 900
Chicago, IL 60654
Tel: (312) 458-1000

Fax: (312) 458-1004
Email: braveendran@rblaw.net
Attorney No.: 6309968/ Ill.

CERTIFICATE OF SERVICE

I do hereby certify that on this 29th day of August, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Jim H. Guynn, Jr. (VSB # 22299)
Guynn & Waddell, P.C.
Counsel for Defendant Officer Pitts
415 S. College Avenue
Salem, Virginia 24153
Phone: 540-387-2320
Fax: 540-389-2350
Email: jimg@guynnwaddell.com

Carlene Booth Johnson VSB No. 36473
Perry Law Firm
A Professional Corporation
Counsel for Defendant Blue Ridge Regional Jail Authority
262 Chellowe Road
Dillwyn, Virginia 23936
Phone: (434) 983-5005
Fax: (434) 983-5021
Email: perrylawfirm@hughes.net

M. Paul Valois, Esquire
JAMES RIVER LEGAL ASSOCIATES
Counsel for Defendant Farrar
7601 Timberlake Road
Lynchburg, Virginia 24502
Phone: (434) 845-4529
Fax: (434) 845-8536
Email: mvalois@vbclegal.com

By: /s Bhavani Raveendran
Bhavani Raveendran

Bhavani Raveendran
ROMANUCCI & BLANDIN
321 N. Clark St.; Ste 900
Chicago, IL 60654
Tel: (312) 458-1000
Fax: (312) 458-1004